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December 2, 2014

United States Environmental Protection Agency, Region 10
Attn: Lynda Priddy, Remedial Project Manager
Environmental Cleanup office, ECL-111
1200 Sixth Ave., Suite 900
Seattle, Washington 98101

Re: Request for Information Pursuant to Section 104(e) of CERCLA for the Quendall
Terminals Superfund Site, Renton, Washington

Dear Ms. Priddy:

We are in receipt of your letter dated September 24, 2014 in connection with the above referenced matter. Given the significant amount of time that has elapsed from the period being investigated, we were unable to locate any commercial documents that were responsive to Information Request Nos. 7-10. However, we were able to locate a number of organizational documents which we believe will shed some light on the relationship of Honolulu Gas Company to some of its successor entities.

This will confirm that The Gas Company, LLC d/b/a Hawaii Gas asserts a confidentiality claim pursuant to 40 C.F.R. part 2, Subpart B, for all documents enclosed with this letter, together with the responses produced pursuant to, or supplemental with, your office's Information Request.

1. Provide the full legal name and mailing address of the Respondent.

The Gas Company, LLC d/b/a/ Hawaii Gas
P.O. Box 3000
Honolulu, Hawaii 96802

2. For each person answering these questions on behalf of Respondent, provide: (a) full name; (b) title; (c) business address; and (d) business telephone number and FAX machine number.



Tom Young
Executive Vice President &
Chief Operating Officer
P.O. Box 3000
Honolulu, Hawaii 96802
808-535-5935 (O)
808-535-5943 (F)

Jack Grimmer
Vice President, EH&S and
QA
P.O. Box 3000
Honolulu, Hawaii 96802
808-535-5569 (O)
808-535-5943 (F)

Nathan Nelson
Vice President, General
Counsel & Secretary
P.O. Box 3000
Honolulu, Hawaii 96802
808-535-5912 (O)
808-535-5943 (F)

3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, please indicate here by providing that individual's name, address, telephone number, and fax number.

Nathan Nelson
Vice President, General Counsel & Secretary
P.O. Box 3000
Honolulu, Hawaii 96802
808-535-5912 (O)
808-535-5943 (F)

4. Describe in detail Respondent's relationship to the Honolulu Gas Company, incorporated in Hawai'i in 1904 and renamed as GasCo, Inc. in 1971. Provide all documents that relate to any corporate succession from Honolulu Gas Company and/or GasCo, Inc. to Respondent, including, but not limited to, articles of incorporation, articles of merger, corporate name changes, purchase/sale agreements, and any relevant state or federal filings.

The Gas Company, LLC ("TGC") is a wholly-owned indirect subsidiary of Macquarie Infrastructure Company, Inc. ("MIC"). The current organizational structure of TGC is as follows: HGC Holdings LLC, is a Hawaii limited liability company and the sole Managing Member of TGC. Macquarie HGC Investment LLC, is a Hawaii limited liability company and the Managing Member of HGC Holdings LLC. Macquarie Gas Holdings LLC, is a Delaware limited liability company and the Managing Member of Macquarie HGC Investment LLC. Macquarie Infrastructure Company, Inc., is a Delaware corporation and the Manager of Macquarie Gas Holdings LLC.

Based on information we were able to locate in corporate records, Honolulu Gas Company, Limited was organized in 1904. A copy of the Articles of Association is

attached hereto.

By instrument dated June 24, 1970, Honolulu Gas Company, Limited, a Hawaii corporation ("HonGas"), Pacific Resources, Inc., a Hawaii Corporation ("PRI"), and Gasco, Inc., a Hawaii corporation and wholly-owned subsidiary of PRI ("Gasco") entered into a Plan of Reorganization and Agreement of Merger. Under said agreement, it appears that Gasco merged with HonGas, with Gasco being the surviving corporation. A copy of the Plan of Reorganization and Agreement of Merger is attached hereto, together with other collateral documents evidencing the same.

By letter dated January 12, 1989, it appears that PRI entered into a merger agreement with The Broken Hill Proprietary Company Limited ("BHP") in which an indirect wholly owned subsidiary of BHP purchased all of the outstanding shares of PRI. A copy of said letter is attached hereto.

Under a Stock Sale Agreement dated January 9, 1997, by and between BHP Hawaii Inc., a Hawaii corporation, and Citizens utilities Company, a Delaware Corporation, BHP sold its interest to Citizens. A copy of said Stock Sale Agreement is attached hereto.

Under an Asset Purchase Agreement dated December 19, 2002, by and between Citizens Communication Company ("Citizens" or "Seller") and K-1 USA Ventures, Inc., ("K-1" or "Buyer"), Citizens sold its interest to K-1. A copy of said Asset Purchase Agreement is attached hereto.

Under a Purchase Agreement dated August 2, 2005 ("Purchase Agreement"), by and among k1 Ventures Limited, a company formed under the laws of Singapore, K-1 HGC Investment, L.L.C., a Delaware limited liability company ("HGC Investment" or "Seller"), and Macquarie Investment Holdings Inc., a Delaware Corporation ("MIHI" or "Buyer"), MIHI acquired the membership interest of HGC Investment. The Purchase Agreement was amended by instruments dated August 17, 2005, and October 21, 2005. A copy of the Purchase Agreement is attached hereto.

5. State the dates during which Respondent or its predecessor owned and/or operated any portion of the manufactured gas plant located at 616 Iwilei Road in Honolulu, Hawai'i (referred to "former GasCo site"). Provide the names of the companies that owned and/or operated at this location during the stated dates and their relationship to Respondent.

Respondent did not own or operate any portion of the manufactured gas plant located at 616 Iwilei Road in Honolulu, Hawai'i. The Iwilei Facility was decommissioned in the 1970s well prior to Respondent's acquisition of the Company. Upon information and belief, Respondent believes the companies that owned and/or operated at this location from 1950-1971 were as follows: (1) Honolulu Gas Company, Limited, a Hawaii corporation; (2) Pacific Resources, Inc., a Hawaii Corporation, and (3) Gasco, Inc., a Hawaii corporation.

6. Identify any other facility owned and/or operated by Respondent or its predecessors that manufactured gas of any type or that were otherwise engaged in the gasification or refining of fossil fuel and that sent, transported, arranged for the transportation of, or otherwise transferred any materials, products, byproducts or wastes to the Quendall Terminals Site. For each facility identified, provide the name and address of the facility, identify the owner and operator of the facility at the time of transfer and its relationship to Respondent, and state the dates during which Respondent or its predecessor owned and/or operated any portion of the facility.

Respondent is not aware of any other facility owned and/or operated by Respondent or its predecessors that manufactured gas of any type or that were otherwise engaged in the gasification or refining of fossil fuel and that sent, transported, arranged for the transportation of, or otherwise transferred any materials, products, byproducts or wastes to the Quendall Terminals Site during 1950-1971.

7 – 10.

The Respondent does not have any information in its possession, custody or control that is responsive to requests No. 7-10.

11. Describe all sources reviewed or consulted in responding to this Request, including, but not limited to:

a. the name and current job title of all individuals consulted;

Tom Young	Jack Grimmer	Nathan Nelson
Executive Vice President & Chief Operating Officer	Vice President, EH&S and QA	Vice President, General Counsel & Secretary
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808-535-5943 (F)	808-535-5943 (F)	808-535-5943 (F)

b. the location where all documents reviewed are currently kept.

**Hawaii Gas
Corporate Records
745 Fort Street, 18th Floor
Honolulu, Hawaii 96813**

We are continuing to review our files for documents responsive to the Information Request and will supplement our responses if any documents relevant to the request are found. If you should have any questions or comments, please contact me by phone at (808) 535-5935 or by email at tkyoung@hawaiigas.com.

Very truly yours,



Thomas K.L.M. Young
Executive Vice President & Chief Operating Officer

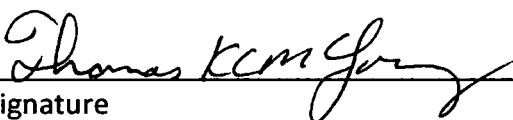
NCN/rtt

Enclosures: as noted in letter

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent and that the foregoing is complete, true and correct to the best of my knowledge.

Executed on December 2, 2014


Signature

Thomas K.L.M. Young
Type of Print Name

Executive Vice President, Chief Operating Officer
Title

Mailing Address: P.O. Box 3000
Honolulu, Hawaii 96802